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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

DWIGHT DOVE,

Plaintiff,

v.

BAYER HEALTHCARE, Biological Products
Division, a for profit business entity,

Defendant.

CASE NO. C-05-02873 JSW

**STIPULATION AND *[PROPOSED]*
ORDER REGARDING EXPERT
DISCOVERY SCHEDULE**

Judge: Honorable Jeffrey S. White

Trial Date: None Set.

1 WHEREAS, in the Stipulation and Court Order Regarding Discovery Schedule, dated
2 December 2, 2005, the Court set the last day for Expert Disclosures as March 24, 2006, and the
3 Close of Expert Discovery as April 24, 2006;

4 WHEREAS, in this Court's Civil Minute Order dated October 31, 2005, this Court set the
5 Hearing on Dispositive Motions for March 24, 2006;

6 WHEREAS, under the above referenced original schedule, therefore, the Close of Expert
7 Discovery was to be approximately 30 days after the Hearing on Dispositive Motions;

8 WHEREAS, the parties have since stipulated, and the Court has ordered, that the hearing for
9 dispositive motions will now take place on May 5, 2006;

10 WHEREAS, under the current schedule the Close of Expert Discover is 11 days before the
11 hearing for dispositive motions, rather than 30 days after;

12 WHEREAS, the parties now seek to realign the schedule such that the Close of Expert
13 Discovery will again be approximately 30 days after the Hearing for Dispositive Motions;

14 WHEREAS, plaintiff, on the one hand, and Bayer, on the other hand, are collectively
15 adverse, they agree through their respective counsel and stipulate as follows:

- 16 1. The Last Day for Expert Disclosures will now be May 8, 2006;
17 2. The Close of Expert Discovery will now be June 5, 2006.

18 **IT IS SO STIPULATED.**

19
20 DATED: March 22, 2006

MOORE & MOORE

21 By: s/Howard Moore, Jr.
22 HOWARD MOORE, JR.
23 Attorney for Plaintiff
24 DWIGHT L. DOVE

25 DATED: March 22, 2006

26 By: s/Charles Stephen Ralston
27 CHARLES STEPHEN RALSTON
28 Attorney for Plaintiff
DWIGHT DOVE

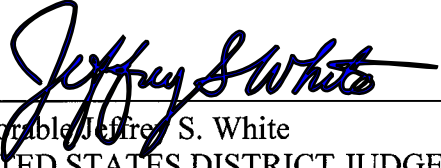
1 DATED: March 22, 2006

THE LOUDERBACK LAW FIRM

2
3 By: s/Stephen K. Robinson
JEROME SCHREIBSTEIN
4 JAMES T. CONLEY
5 STEPHEN K. ROBINSON
Attorneys for Defendant
6 BAYER HEALTHCARE LLC

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8 **IT IS SO ORDERED.**

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10 Dated: March 27, 2006


11 Honorable Jeffrey S. White
UNITED STATES DISTRICT JUDGE
12 NORTHERN DISTRICT OF CALIFORNIA

13 Doc#: 37178
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